

Exhibit 1

From: [Luis Calvo](#)
To: [Robert M. Lefland](#)
Cc: [Robert M. Lefland](#); [Jack A. Gordon](#); [Joshua B. Katz](#)
Subject: Holland v. Matos et. al. - 18-cv-6697 (KMK)
Date: Tuesday, November 20, 2018 4:06:00 PM

Dear Mr. Lefland,

I write to confirm our conversation earlier today. As discussed and agreed, on the following dates, the parties will exchange:

- Rule 26(a) Disclosures by January 4, 2019;
- Produce documents and responses to discovery demands by January 30, 2019;
- Depositions will be conducted by April 26, 2019; and
- Expert Reports regarding each party's claims by June 1, 2019; rebuttal reports 30 days after.

The above dates are subject to modification by Judge Karas.

Additionally, we would like to parties to enter into a protective order for documents exchanged in discovery. If agreeable, we will send you a draft order for your review.

Regards,
Luis

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